

Lexi J. Hazam (SBN 224457)
lhazam@lchb.com
LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000

Previn Warren (*pro hac vice*)
pwarren@motleyrice.com
MOTLEY RICE LLC
401 9th Street NW, Suite 630
Washington, DC 20004
Telephone: (202) 386-9610

Plaintiffs' Co-Lead Counsel

[Additional Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

ALL CASES

**STIPULATION AND [PROPOSED] ORDER
RE SNAP'S OMNIBUS MOTION TO SEAL
(PLAINTIFFS' OMNIBUS OPPOSITION
BRIEF AND NON-EXHIBIT MATERIALS)**

Pursuant to Civil Local Rule 7-12, Plaintiffs and Snap Inc. (“Snap”, and together, the “Parties”) by and through their counsel of record hereby stipulate as follows:

WHEREAS, on December 10, 2025, Snap filed an Omnibus Motion to Seal (Plaintiffs’ Omnibus Opposition Brief and Non-Exhibit Materials) (“Snap’s Motion to Seal”) (ECF No. 2531) seeking to seal portions of certain exhibits filed with this Court in connection with Plaintiffs’ Rule 702 and Summary Judgment Oppositions;

WHEREAS, on December 17, 2025, the Parties met and conferred further in an effort to resolve outstanding differences and avoid the need for further motion practice;

WHEREAS, after meeting and conferring, Snap agreed to withdraw its request to redact and seal a Snap employee’s name identified on Page 96 of the Expert Report of Dimitri A. Christakis, M.D., M.P.H. (ECF Nos. 2400-18, 2405-18, 2407-03) (“Christakis Report”) and on Page 46 of the Expert Report of Anna Lembke, M.D. (ECF Nos. 2405-13, 2407-05) (“Lembke Report”), as well as Twitter user names contained in an embedded image on Page 97 of the Christakis Report;

WHEREAS, with this adjustment, Plaintiffs do not object to the remainder of the requests in Snap’s Motion to Seal;

THEREFORE, the Parties Stipulate and seek an Order dismissing as moot Snap’s pending Motion to Seal and, upon good cause showing, as follows:

Document	Portion to be Sealed	Basis for Sealing	Whether Previously Sealed	Court’s Order
Plaintiffs’ Opposition to Defendants’ Harford Motion for Summary Judgment - Christakis MDL expert report (Exhibit 16, ECF No. 2400-18)	Page 147: Employee name; Twitter user name	There is good cause to seal these non-deponent employee names to protect their privacy interests at this time. <i>See, e.g., Murphy v. Kavo Am. Corp.</i> , 2012 WL 1497489, at *1, *2 (N.D. Cal. Apr. 27, 2012) (granting motion to seal “employee-identifying information” because “[e]mployees and former employees who are not parties to this litigation have privacy	To Snap’s knowledge, no party has previously sought to seal this information.	Granted ____ Denied ____

Document	Portion to be Sealed	Basis for Sealing	Whether Previously Sealed	Court's Order
		<p>interests in their personnel information, and in other sensitive identifying information”) (Gonzalez Rogers, J.); <i>see also</i>, e.g., <i>Am. Auto. Ass’n of N. California, Nevada & Utah v. Gen. Motors LLC</i>, 2019 WL 1206748, at *2 (N.D. Cal. Mar. 14, 2019); <i>Opperman v. Path, Inc.</i>, 2017 WL 1036652, at *4 (N.D. Cal. Mar. 17, 2017); <i>Hunt v. Cont’l Cas. Co.</i>, 2015 WL 5355398, at *2 (N.D. Cal. Sept. 14, 2015). Sealing this information is consistent with the Court’s approach to sealing employee names in the Personal Injury Plaintiffs’ Master Complaint and the multistate Attorney General Complaint. <i>See</i> ECF No. 189; Case No. 4:23-cv-05448-YGR, ECF No. 77. Sealing this information is further warranted to protect the employees’ safety. <i>Cf. Campbell v. Grounds</i>, 2022 WL 14151744, at *1 (N.D. Cal. Oct. 24, 2022) (sealing witness name and finding standard met when disclosure “could put at risk the safety of one or more individuals if made public”); <i>see also</i> Declaration of Jennifer Boden ¶¶ 2–4.</p> <p>There is also good cause to seal the names of these non-party, non-employees. These individuals enjoy the same privacy and other interests as the non-deponent employees discussed above. <i>See Foltz v. State Farm Mut. Auto. Ins. Co.</i>, 331 F.3d 1122, 1137 (9th Cir. 2003) (referring broadly to “third-party” privacy interests in redacting); <i>Am. Auto. Ass’n</i>, 2019 WL 1206748, at *2 (same);</p>		

Document	Portion to be Sealed	Basis for Sealing	Whether Previously Sealed	Court's Order
		<i>Opperman</i> , 2017 WL 1036652, at *4 (similar). The personal information of these third parties is irrelevant to the issues before the Court and redacting them is necessary to protect these individuals' privacy. <i>See</i> Declaration of Laura M. Lopez ¶ 2.		
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts - Christakis MDL expert report (Exhibit 15, ECF No. 2405-18)	Page 147: Employee name; Twitter user name	See above	To Snap's knowledge, no party has previously sought to seal this information.	Granted ____ Denied ____
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts - Lembke MDL Expert Report (Exhibit 10, ECF No. 2405-13)	Page 47: Employee names	See above	To Snap's knowledge, no party has previously sought to seal this information.	Granted ____ Denied ____

Document	Portion to be Sealed	Basis for Sealing	Whether Previously Sealed	Court's Order
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts - Lembke MDL Expert Report (Exhibit 10, ECF No. 2405-13)	Page 54: Employee name	See above	To Snap's knowledge, no party has previously sought to seal this information.	Granted ____ Denied ____
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts - Murray MDL Expert Report (Exhibit 32, ECF No. 2405-35)	Page 169: Employee name	See above	To Snap's knowledge, no party has previously sought to seal this information.	Granted ____ Denied ____
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts - Deposition of Stuart Murray, June 19, 2025 (Exhibit 30, ECF No. 2405-33)	504:1 Employee name	See above	To Snap's knowledge, no party has previously sought to seal this information.	Granted ____ Denied ____

Document	Portion to be Sealed	Basis for Sealing	Whether Previously Sealed	Court's Order
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' General Causation Experts - Deposition of Stuart Murray, June 19, 2025 (Exhibit 30, ECF No. 2405-33)	504:8 Employee name	See above	To Snap's knowledge, no party has previously sought to seal this information	Granted ____ Denied ____
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' School District Experts - Christakis MDL expert report (Exhibit 1, ECF No. 2407-03)	Page 147: Employee name; Twitter user name	See above	To Snap's knowledge, no party has previously sought to seal this information.	Granted ____ Denied ____
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' School District Experts - Lembke MDL Expert Report (Exhibit 3, ECF No. 2407-05)	Page 47: Employee names	See above	To Snap's knowledge, no party has previously sought to seal this information.	Granted ____ Denied ____

Document	Portion to be Sealed	Basis for Sealing	Whether Previously Sealed	Court's Order
Plaintiffs' Opposition to Defendants' Motion to Exclude Plaintiffs' School District Experts - Lembke MDL Expert Report (Exhibit 3, ECF No. 2407-05)	Page 54: Employee name	See above	To Snap's knowledge, no party has previously sought to seal this information.	Granted ____ Denied ____

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATE: _____

Hon. Yvonne Gonzalez Rogers

Dated: December 17, 2025

Respectfully submitted,

ANDRUS ANDERSON LLP

/s/ Jennie Lee Anderson

Jennie Lee Anderson (SBN 203586)

jennie@andrusanderson.com

ANDRUS ANDERSON LLP

1970 Broadway, Suite 1070

Oakland, CA 94612

Telephone: (415) 986-1400

Plaintiffs' Liaison Counsel

Lexi J. Hazam (SBN 224457)

lhazam@lchb.com

**LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP**

275 Battery Street, 29th Floor

San Francisco, CA 94111-3339

Telephone: (415) 956-1000

Facsimile: (415) 956-100

Previn Warren (*pro hac vice*)

pwarren@motleyrice.com
MOTLEY RICE LLC
401 9th Street NW, Suite 630
Washington, DC 20004
Telephone: (202) 386-9610
Facsimile: (202) 232-5513

Plaintiffs' Co-Lead Counsel

Christopher A. Seeger (*pro hac vice*)
SEEGER WEISS, LLP
55 Challenger Road, 6th Floor
Ridgefield Park, NJ 07660
Telephone: (973) 639-9100
Facsimile: (973) 679-8656
cseeger@seegerweiss.com

Counsel to the Co-Lead Counsel and Settlement Counsel

JOSEPH G. VANZANDT
**BEASLEY ALLEN CROW METHVIN
PORTIS & MILES, P.C.**
234 COMMERCE STREET
MONTGOMERY, AL 36103
Telephone: 334-269-2343
joseph.vanzandt@beasleyallen.com

EMILY C. JEFFCOTT
MORGAN & MORGAN
220 W. GARDEN STREET, 9TH FLOOR
PENSACOLA, FL 32502
Telephone: 850-316-9100
ejeffcott@forthepeople.com

Federal/State Liaisons

MATTHEW BERGMAN
SOCIAL MEDIA VICTIMS LAW CENTER
821 SECOND AVENUE, SUITE 2100
SEATTLE, WA 98104
Telephone: 206-741-4862
matt@socialmediavictims.org

JAYNE CONROY
SIMMONS HANLY CONROY, LLC
112 MADISON AVE, 7TH FLOOR
NEW YORK, NY 10016
Telephone: 917-882-5522
jconroy@simmonsfirm.com

1
2
3 ANDRE MURA
4 **GIBBS LAW GROUP, LLP**
5 1111 BROADWAY, SUITE 2100
6 OAKLAND, CA 94607
7 Telephone: 510-350-9717
8 amm@classlawgroup.com

9
10 MICHAEL M. WEINKOWITZ
11 **LEVIN SEDRAN & BERMAN, LLP**
12 510 WALNUT STREET
13 SUITE 500
14 PHILADELPHIA, PA 19106
15 Telephone: 215-592-1500
16 mweinkowitz@lfsbalw.com
17 ALEXANDRA WALSH
18 **WALSH LAW**
19 1050 Connecticut Ave, NW, Suite 500
20 Washington D.C. 20036
21 Telephone: 202-780-3014
22 awalsh@alexwalshlaw.com

23
24 JAMES J. BILSBORROW
25 **WEITZ & LUXENBERG, PC**
26 700 BROADWAY
27 NEW YORK, NY 10003
28 Telephone: 212-558-5500
jbilsborrow@weitzlux.com
Plaintiffs' Steering Committee Leadership

PAIGE BOLDT
WATTS GUERRA LLP
4 Dominion Drive, Bldg. 3, Suite 100
San Antonio, TX 78257
Telephone: 210-448-0500
PBoldt@WattsGuerra.com

CARRIE GOLDBERG
C.A. GOLDBERG, PLLC
16 Court St.
Brooklyn, NY 11241
Telephone: (646) 666-8908
carrie@cagoldberglaw.com

SIN-TINY MARY LIU
**AYLSTOCK WITKIN KREIS & OVERHOLTZ,
PLLC**

1
2 17 EAST MAIN STREET, SUITE 200
3 PENSACOLA, FL 32502
4 Telephone: 510-698-9566
5 mliu@awkolaw.com

6 EMMIE PAULOS
7 **LEVIN PAPANTONIO RAFFERTY**
8 316 SOUTH BAYLEN STREET, SUITE 600
9 PENSACOLA, FL 32502
10 Telephone: 850-435-7107
11 epaulos@levinlaw.com

12 ROLAND TELLIS
13 **BARON & BUDD, P.C.**
14 15910 Ventura Boulevard, Suite 1600
15 Encino, CA 91436
16 Telephone: (818) 839-2333
17 rtellis@baronbudd.com

18 DIANDRA "FU" DEBROSSE ZIMMERMANN
19 **DICELLO LEVITT**
20 505 20th St North
21 Suite 1500
22 Birmingham, Alabama 35203
23 Telephone: 205.855.5700
24 fu@dicellolevitt.com

25 HILLARY NAPPI
26 **HACH & ROSE LLP**
27 112 Madison Avenue, 10th Floor
28 New York, New York 10016
Telephone: 212.213.8311
hnappi@hrsclaw.com

JAMES MARSH
MARSH LAW FIRM PLLC
31 HUDSON YARDS, 11TH FLOOR
NEW YORK, NY 10001-2170
Telephone: 212-372-3030
jamesmarsh@marshlaw.com

RUTH RIZKALLA
CARLSON LAW FIRM
100 E. Central Texas Expy
Killeen, TX 76541
Telephone: (254) 526-5688
RRizkalla@carlsonattorneys.com

Ron A. Austin
RON AUSTIN LAW
400 Manhattan Blvd
Harvey, LA 70058
504-227-8100
Fax: 504-227-8122
raustin@ronaustinlaw.com

Plaintiffs' Steering Committee Membership

MUNGER, TOLLES & OLSON LLP

By: /s/ Jonathan H. Blavin
Jonathan H. Blavin

JONATHAN H. BLAVIN, SBN 230269
jonathan.blavin@mto.com
MUNGER, TOLLES & OLSON LLP
560 Mission Street, 27th Floor
San Francisco, CA 94105
Tel.: (415) 512-4000

VICTORIA A. DEGTYAREVA, SBN 284199
Victoria.Degtyareva@mto.com
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, 50th Floor
Los Angeles, CA 90071
Tel.: (213) 683-9100
Facsimile: (213) 687-3702

Attorneys for Defendant Snap Inc.

SIGNATURE CERTIFICATION

Pursuant to Civ. L.R. 5-1(i)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

Dated: December 17, 2025

/s/ Jennie Lee Anderson

JENNIE LEE ANDERSON

ANDRUS ANDERSON, LLP

155 MONTGOMERY STREET, SUITE 900

SAN FRANCISCO, CA 94104

Telephone: + 1 (415) 986-1400

Email: jennie@andrusanderson.com

Liaison Counsel for Plaintiffs